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**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** All papers shall be filed in the Lead Case,
No. 19-30088 (DM).*

Case No. 19-30088 (DM)
Chapter 11
(Lead Case) (Jointly Administered)

**NOTICE OF REVISED PROPOSED
ORDER AND REQUEST FOR ENTRY OF
ORDER BY DEFAULT ON
ENVIRONMENTAL AGREEMENTS
ASSUMPTION MOTION**

[Re: Dkt No. 3581]

Date: September 24, 2019
Time: 9:30 a.m. (Pacific Time)
Place: United States Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, CA 94102

Objection Deadline: September 10, 2019
4:00 p.m. (Pacific Time)

1 **REQUEST FOR ENTRY OF ORDER BY DEFAULT**

2 PG&E Corporation (“**PG&E Corp.**”) and Pacific Gas and Electric Company (the
3 “**Utility**”), as debtors and debtors in possession (collectively, “**PG&E**” or the “**Debtors**”) in the above-
4 captioned chapter 11 cases (the “**Chapter 11 Cases**”), hereby request, pursuant to Rule 9014-1(b)(4) of
5 the Bankruptcy Local Rules for the United States District Court for the Northern District of California,
6 as made applicable to these Chapter 11 Cases by the *Second Amended Order Implementing Certain*
7 *Notice and Case Management Procedures* entered on May 14, 2019 [Dkt No. 1996] (“**Case**
8 **Management Order**”), that the Court enter an order by default on the *Fourth Omnibus Motion of the*
9 *Debtors Pursuant to 11 U.S.C. § 365(a), Fed. R. Bankr. P. 6006, and B.L.R. 6006-1 for an Order*
10 *(I) Approving Assumption of Environmental Agreements and (II) Granting Related Relief*
11 *(“Environmental Agreements Assumption Motion”)* [Dkt No. 3581] (the “**Motion**”).

12 **RELIEF REQUESTED IN THE MOTION**

13 The Motion seeks an order (i) approving the Debtors’ assumption of agreements with
14 four (4) counterparties thereto (collectively, the “**Owners**”) that provide the Debtors access to the
15 Owners’ property to carry out environmental investigation and, in certain instances, land remediation
16 and restoration obligations and (ii) granting related relief. A proposed order (the “**Original Proposed**
17 **Order**”) was attached as an exhibit to the Motion. A revised proposed order (the “**Revised Proposed**
18 **Order**”), which reflects that no hearing was held on the Motion, is attached hereto as **Exhibit 1-1**. A
19 redline comparison of the Original Proposed Order and the Revised Proposed Order is attached hereto
20 as **Exhibit 1-2**.

21 **NOTICE AND SERVICE**

22 A *Notice of Hearing on Fourth Omnibus Motion of Debtors Pursuant to 11 U.S.C.*
23 *§ 365(a), Fed. R. Bankr. P. 6006, and B.L.R. 6006-1 for an Order (I) Approving Assumption of*
24 *Environmental Agreements and (II) Granting Related Relief* was filed concurrently with the Motion on
25 August 16, 2019 [Dkt. No. 3583] (the “**Notice of Hearing**”). The Motion, the supporting declaration of
26 Margaret A. Pietrasz, and the Notice of Hearing were served as described in the Certificate of Service
27 of Alain B. Francoeur filed on August 21, 2019 [Dkt. No. 3642].

28 The deadline to file responses or oppositions to the Motion has passed, and no oppositions

1 have been filed with the Court or received by counsel for the Debtors.

2 **DECLARATION OF NO OPPOSITION RECEIVED**

3 The undersigned hereby declares, pursuant to 28 U.S.C. § 1746, under penalty of perjury,
4 that:

5 1. I am an attorney with the firm of Keller & Benvenutti LLP, co-counsel for the
6 Debtors.

7 2. I have reviewed the Court's docket in the Chapter 11 Cases and have determined
8 that no response or opposition has been filed with respect to the Motion.

9 3. This declaration was executed in San Francisco, California.

10 WHEREFORE, the Debtors hereby request entry of the Revised Proposed Order
11 substantially in the form attached to the hereto, granting the Motion as set forth therein.

12
13 Dated: September 12, 2019

WEIL, GOTSHAL & MANGES LLP
KELLER & BENVENUTTI LLP

/s/ Thomas B. Rupp

Thomas B. Rupp

Attorneys for Debtors and Debtors in Possession